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4 Attorney for Defendant
5 SARAH A ROPATI

6 UNITED STATES DISTRICT COURT
7 NORTHERN DISTRICT OF CALIFORNIA
8 SAN FRANCISCO DIVISION

9 UNITED STATES OF AMERICA) No. CR-07-00645-MMC
10)
11)

11 Plaintiff,

**EX PARTE APPLICATION TO PERMIT
DEFENDANTS IN CUSTODY TO REVIEW
DISCOVERY ON MP3 MACHINES;
PROPOSED ORDERS**

12)
13)
14 RONALD WILLIAMS, et al,)
15)

15 Defendants.
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17 Ian Loveseth, counsel for defendant Sarah A. Ropati, and CJA liaison counsel for all defendants
18 and their counsel in this case, hereby applies for an Order permitting all in-custody defendants to
19 review discovery on an MP3 machine. This application is based on the files and records in this
20 case and the accompanying declaration of counsel.
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DATED: March 10, 2008

/s/ Ian Loveseth
IAN LOVESETH
Counsel for Defendant
SARAH A. ROPATI

DECLARATION OF COUNSEL

I, Ian Loveseth, declare as follows:

1. I am counsel for Sarah A. Ropati in Untied States vs. Ronald Williams, et al.,
CR. 07-00645-MMC;

2. I am also liaison CJA counsel in this case;

3. I have been advised by Steven D. Moore, the discovery coordinator in this case, that
the discovery consists of approximately 35,000 intercepted wiretap calls on eight (8) different
target lines;

4. The defendants in this case must listen to and review the discovery and the most
efficient way to provide them with these calls in to put them on MP3s;

5. Accordingly, declarant requests that two Court orders be signed permitting
defendants at the Santa Rita Jail and at the Glen Dyer Detention Facility to listen to the discovery
on MP3s.

I declare under penalty of perjury that the above is true and correct to the best of my
knowledge. Executed in San Francisco on March 10, 2008.

/s/ Ian Loveseth
IAN LOVESETH

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5 SARAH A ROPATI

6 UNITED STATES DISTRICT COURT
7 NORTHERN DISTRICT OF CALIFORNIA
8 SAN FRANCISCO DIVISION

9 UNITED STATES OF AMERICA) No. CR-07-00645-MMC
10)
11 Plaintiff,) [PROPOSED] ORDER PERMITTING
12) DEFENDANTS TO USE MP3
13 v.) AUDIO PLAYERS TO REVIEW
14 RONALD WILLIAMS, et.al.,) DISCOVERY AT SANTA RITA JAIL
15)
16 Defendants.)
The Honorable Maxine M. Chesney

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1 Finding good cause shown, as discovery has been provided in digital audio format:

2 IT IS HEREBY ORDERED that the following defendants be permitted to use an MP3
3 player in order to review audio discovery at Santa Rita Jail;

4 BARRY LYNN SAMUEL,

5 ELEAZOR MORA-ARCIGA,

6 SALVADOR ORTEGA,

7 ERIKA MANZO,

8 JAVIER ULISES ZAMORA-HERNANDEZ,

9 ALFREDO GONZALEZ GOVEA,

10 CESAR RAMIREZ-CHAVIRA,

11 MIGUEL RAMIREZ.

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13 IT IS SO ORDERED.

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15 Dated: _____

16 THE HONORABLE MAXINE M. CHESNEY
United States District Judge

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6 UNITED STATES DISTRICT COURT
7 NORTHERN DISTRICT OF CALIFORNIA
8 SAN FRANCISCO DIVISION

9 UNITED STATES OF AMERICA) No. CR-07-00645-MMC
10)
11 Plaintiff,) [PROPOSED] ORDER PERMITTING
12) DEFENDANTS TO USE MP3
13 v.) AUDIO PLAYERS TO REVIEW
14 RONALD WILLIAMS, et.al.,) DISCOVERY AT GLENN DYER
15) DETENTION FACILITY
16 Defendants.)
The Honorable Maxine M. Chesney

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1 Finding good cause shown, as discovery has been provided in digital audio format:

2 IT IS HEREBY ORDERED that the following defendants be permitted to use an MP3
3 player in order to review audio discovery at Glenn Dyer Detention Facility, Oakland, CA (North
4 County);

5 RONALD WILLIAMS,

6 JOSE JUAN PENALOZA-HILARIO,

7 SAMUEL ARANDA,

8 MICHAEL JOSEPH SILVA,

9 RONALD LEE HINES,

10 JOSE ANTONIO CAMACHO-MENDEZ,

11 EDWARD LEROY MOORE.

12
13 IT IS SO ORDERED.

14
15 Dated: _____

16 THE HONORABLE MAXINE M. CHESNEY
United States District Judge